

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
2 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
3 ERIC A. TATE (CA SBN 178719)
ETate@mofo.com
4 RUDY Y. KIM (CA SBN 199426)
RKim@mofo.com
5 MORRISON & FOERSTER LLP
425 Market Street
6 San Francisco, California 94105-2482
Telephone: 415.268.7000
7 Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflp.com
9 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflp.com
10 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
11 Washington, D.C. 20005
Telephone: 202.237.2727
12 Facsimile: 202.237.6131

13 *Counsel for Defendants*
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE
MOTION TO REMOVE
INCORRECTLY FILED DOCUMENTS:
DOCKET NOS. 1557-7, 1557-8 AND
1559-3**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

1 Uber Technologies, Inc. and Ottomotto LLC (together, “Uber”) file this Administrative
2 Motion to Remove the following documents from ECF, submitted electronically on September
3 13, 2017, by Defendants:

- 4
5 1. Docket Number 1557-7: Redacted Version of Exhibit 10 to Declaration of Martha
6 L. Goodman in Support of Defendants’ Motion *in Limine* Nos. 2 and 22-25;
- 7 2. Docket Number 1557-8: Under Seal Version of Exhibit 10 to Declaration of
8 Martha L. Goodman in Support of Defendants’ Motion *in Limine* Nos. 2 and 22-
9 25;
- 10 3. Docket Number 1559-3: Redacted Version of Exhibit 10 to Declaration of Martha
11 L. Goodman in Support of Defendants’ Motion *in Limine* Nos. 2 and 22-25.

12
13 These documents contain information designated by Waymo as highly confidential that
14 Waymo inadvertently did not identify for Uber to redact prior to Uber’s filing of the documents.
15 Uber has contacted the ECF Help Desk regarding this issue. Uber has also filed correct versions
16 of these documents with the confidential information at issue redacted at Docket Numbers 1595
17 and 1595-1.

18 For the foregoing reasons, Uber respectfully requests that the Court grant this Motion to
19 Remove.

20
21 Dated: September 15, 2017

BOIES SCHILLER FLEXNER LLP

22
23 By: /s/ Karen L. Dunn

Karen L. Dunn

24
25 *Counsel for Defendants*
26 UBER TECHNOLOGIES, INC. AND
27 OTTOMOTTO LLC
28